

Exhibit V

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EXHIBITS 1-20

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-CV-11340DPW

* * * * *

STEPHEN KEEFE,

PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL

LONGSHOREMEN'S ASSOCIATION,

AFL-CIO, ET. AL,

DEFENDANTS.

* * * * *

DEPOSITION OF STEPHEN KEEFE, taken on
behalf of the Defendants, pursuant to the
applicable provisions of the Federal Rules of
Civil Procedure, before Bernadette J. D'Alelio,
Notary Public and Court Reporter within and for
the Commonwealth of Massachusetts, at the
Offices of Mullen & McGourty, 52 Temple Place,
Boston, Massachusetts, on May 8, 2006,
at 10:01 a.m., as follows:

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- 1 A. You would have to talk to my brother.
 2 I have nothing to do with that.
- 3 Q. Prior to your suspension, do you
 4 contend that you weren't given written notice
 5 about the specific charges that you were being
 6 summoned to by the rules committee?
- 7 A. I never received anything from Joe
 8 Picard at my post-office box.
- 9 Q. Even that letter you signed for, which
 10 is marked --
- 11 A. This one, I received. This other
 12 stuff -- I've never received anything from Joe
 13 Picard. I received stuff from McGaff.
- 14 Q. About what?
- 15 A. I don't know what -- I don't know what
 16 it was for.
- 17 Q. When you went to the rules committee
 18 on March 5, to that meeting, why did you go?
- 19 A. I was told to go.
- 20 Q. By who?
- 21 A. By the rules committee.
- 22 Q. In what manner were you told, verbally
 23 or in writing?
- 24 A. In writing.

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- 1 Q. That is what the certified-mail card
 2 is?
- 3 A. It coincides with that, yes.
- 4 Q. In reading Exhibit 18, do you
 5 understand what is being stated in that letter?
- 6 A. Yeah.
- 7 Q. Did you understand it when you read
 8 it?
- 9 A. Yes.
- 10 Q. And you got that on February 18th; is
 11 that right?
- 12 A. Yup.
- 13 Q. That is about two weeks prior to the
 14 meeting?
- 15 A. Yes.
- 16 Q. Do you contend that two weeks' notice
 17 is an unreasonable amount of time for you to be
 18 summoned to a meeting?
- 19 A. No.
- 20 Q. When you got into the hearing or the
 21 meeting, you waited outside and then you were
 22 summoned in; is that right?
- 23 A. Yes.
- 24 Q. Given what you've read from Exhibit

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- 1 Q. So that would be Exhibit 18; is that
 2 right?
- 3 A. Yes.
- 4 Q. What does Exhibit 18 say? Can you
 5 read that into the record, please?
- 6 A. The whole thing?
- 7 Q. Yeah.
- 8 A. "The Allied rules committee, who are
 9 empowered by Rule Number 37 of the hiring hall
 10 rules, are hereby notifying you to appear
 11 before them. The committee summons you on this
 12 date of March 5, 2003, at 12 noon to appear at
 13 the hiring hall. The purpose of this hearing
 14 is for you to show just cause as to why you
 15 should not be suspended and placed into Gang
 16 12. Please bring with you any resignation, any
 17 retirement papers, tax returns or any other
 18 documents that you deem pertinent. We have
 19 found you to be in violation of not honoring
 20 the pledge that you signed. Failure to appear
 21 at this hearing could also result in a
 22 sanction."
- 23 Q. And you got that letter?
- 24 A. I think I got that one, yeah.

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- 1 18, do you recall any discussion as to what the
 2 point of view -- being called to the meeting?
- 3 A. I don't remember anything about what
 4 they were saying at the meeting.
- 5 Q. Did you go with an attorney to the --
- 6 A. No.
- 7 Q. At the time, Mr. Lathrop was
 8 representing you, though, wasn't he?
- 9 A. Yeah, I think so, right. Yeah.
- 10 Q. Did you inform the rules committee on
 11 March 5, 2005, that you were working for John
 12 T. Clark as a consultant?
- 13 A. I don't know if I said that.
- 14 Q. Did you inform the rules committee, or
 15 did you state to the rules committee that they
 16 knew of your employment at John T. Clark, yet
 17 allowed you to move up from 12 to 11?
- 18 A. I don't remember.
- 19 Q. If you admitted that you were employed
 20 by Clark at that rules committee meeting, do
 21 you have any memory of saying you were going to
 22 resign your position because you wanted to stay
 23 in Gang 10?
- 24 A. I don't remember.